

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE:

JASON L. WOEHLE

Debtor.

NO. 18-12299 CMA

DECLARATION OF MANISH BORDE IN
SUPPORT OF TRUSTEE'S MOTION FOR
AN ORDER APPOINTING SPECIAL
COUNSEL FOR THE TRUSTEE UPON A
MIXED HOURLY/CONTINGENT BASIS

I, Manish Borde, say:

1. I am an attorney at law admitted to practice before this Court and am the Managing Member of the law firm of BORDE LAW PLLC, 600 Stewart Street, Suite 400, Seattle, WA 98101 ("BORDE LAW"). I have personal knowledge of the facts set forth herein, and am competent to testify to the same.

2. BORDE LAW represents no other entity in connection with this case, is not a creditor of this estate, is disinterested as that term is defined in 11 U.S.C. § 101(14) and does not represent or hold any interest adverse to the interest of the estate with respect to the matters on which it is to be employed. Neither Manish Borde nor BORDE LAW has any connection to the debtor, creditors, any party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee. I am a former Member of Williams, Kastner & Gibbs PLLC, and started my own firm in January of

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600 Stewart Street, Suite 400
Seattle, Washington 98101
(206) 905-6129

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1 2019. I recently learned while reviewing the docket of *Brandt v. Woehler*, W.D. Wash. Case
2 No. 2:17-cv-00703-RSM (the U.S. District Court case that gave rise to the judgment against
3 Woehler) that Williams Kastner had acted as local counsel for Sacor Financial, Inc. (the would-
4 be defendant in any litigation). I was not involved with the case while I was at Williams
5 Kastner.

6 3. I have advised the Trustee of BORDE LAW's willingness to serve as her
7 counsel based on the mixed hourly/contingent fee agreement. My standard hourly billing rate
8 for matters concerning Chapter 7 trustee representation is \$395. Thus, the \$295 hourly rate
9 reflected in the mixed hourly/contingent fee agreement constitutes a discount of my standard
10 hourly billing rate for matters concerning Chapter 7 trustee representation.

11 4. I have read Local Bankruptcy Rule 2016.

12 I declare under penalty of perjury under the laws of the United States of America that
13 the foregoing is true and correct.

14 DATED this 14th day of May, 2019.

15 /s/ Manish Borde

16 Manish Borde, WSBA #39503
17 BORDE LAW PLLC
18 600 Stewart Street, Suite 400
19 Seattle, WA 98101
20 Telephone: (206) 905-6129
21 mborde@bordelaw.com

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1 PROOF OF FILING

2 The undersigned hereby certifies that on May 14, 2019, I electronically filed the
3 foregoing with the Clerk of the Court using the CM/ECF system, which will send notification
4 of such filing to the CM/ECF participants.

5 DATED this 14th day of May, 2019.

7 /s/ Manish Borde
8 Manish Borde, WSBA #39503
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9 Seattle, WA 98101
Telephone: (206) 905-6129
10 mborde@bordelaw.com

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